

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, : :

Plaintiff, : Case No. 3:15-CR-148
vs. : :

WILLIAM M. APOSTELOS, : Judge Thomas Rose

Defendant.

UNOPPOSED MOTION TO MODIFY BOND

Now comes the Defendant, WILLIAM M. APOSTELOS, by and though undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond to allow United States Pretrial Services to approve a schedule of visitation for Mr. Apostelos to visit his mother, who suffered a heart attack over the Memorial day weekend, on a more regular and frequent basis.

In addition, Mr. Apostelos asks that he be allowed to have limited contact with his sister and niece, so that they may discuss their mother's care and so that they may also visit their mother at the same time. Mr. Apostelos understands and agrees that if this Court grants this motion, he remains prohibited from discussing any aspect of the case against him with his sister or his niece.

Assistant United States Attorney Brent Tabacchi and United States Pretrial Officer Kelvin Gover have no objection to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins

F. Arthur Mullins (0080483)
Assistant Federal Public Defender
Fifth Third Center, Suite 490
1 South Main Street
Dayton, Ohio 45402
(937) 225-7687
Art_Mullins@fd.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic filing, this 31st day of May, 2016.

s/F. Arthur Mullins

F. Arthur Mullins

Attorney for Defendant
William M. Apostelos